

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Newport News Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 4:03cr107
)	
)	26 U.S.C. §§ 7206(1)& 2
v.)	False Tax Return
)	(Counts 1-3)
WILLIAM E. VAUGHN)	
)	
)	
Defendant.)	

SUPERSEDING CRIMINAL INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about April 14, 1998, in the Eastern District of Virginia, defendant WILLIAM E. VAUGHN, a resident of Newport News, Virginia, willfully made and subscribed and caused to be made and subscribed, a United States Personal Income Tax Return, Form 1040, for the calendar year ending December 31, 1997, which was verified by a written declaration that it was made under the penalties of perjury and was filed with Internal Revenue Service, which said U.S. Personal Income Tax Return he did not believe to be true and correct as to every material matter in that the tax return reported, on Schedule C, line 1, gross receipts of \$431,468 generated by Philly's, Inc., when in truth and fact, as the defendant well knew and believed, Philly's, Inc. had additional, unreported gross receipts of \$57,011.

(In violation of Title 26, United States Code, Sections 7206(1) and 2).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about November 3, 1999, in the Eastern District of Virginia, defendant WILLIAM E. VAUGHN, a resident of Newport News, Virginia, willfully made and subscribed and caused to be made and subscribed, a United States Personal Income Tax Return, Form 1040, for the calendar year ending December 31, 1998, which was verified by a written declaration that it was made under the penalties of perjury and was filed with Internal Revenue Service, which said U.S. Personal Income Tax Return he did not believe to be true and correct as to every material matter in that the tax return reported, on Schedule C, line 1, gross receipts of \$523,363 generated by Philly's, Inc., when in truth and fact, as the defendant well knew and believed, Philly's, Inc. had additional, unreported gross receipts of \$234,284.

(In violation of Title 26, United States Code, Sections 7206(1) and 2).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about September 12, 2000, in the Eastern District of Virginia, defendant WILLIAM E. VAUGHN, a resident of Newport News, Virginia, willfully made and subscribed and caused to be made and subscribed, a United States Corporate Income Tax Return, Form 1040, for the calendar year ending December 31, 1999, which was verified by a written declaration that it was made under the penalties of perjury and was filed with Internal Revenue Service, which said U.S. Corporate Income Tax Return he did not believe to be true and correct as to every material matter in that the tax return reported, on line 1a, gross receipts of \$649,339 generated by Philly's, Inc. when in truth and fact, as the defendant well knew and believed, Philly's, Inc. had additional, unreported gross receipts of \$311,464.

(In violation of Title 26, United States Code, Sections 7206(1) and 2).

PAUL J. McNULTY
UNITED STATES ATTORNEY

By: _____
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